



May 21, 2015

*Via E-Mail and hand delivery*

To: David Sanchez, Senior Planner

**Re: WPRA scoping comments on the proposed Rose Bowl Music & Arts Festival EIR**

The West Pasadena Residents' Association is interested in seeing the Rose Bowl Music & Arts Festival develop as an opportunity to showcase Pasadena as a cultural nexus in art, music, dining, and of course, the natural beauty of the Arroyo Seco. In addition, this major event must provide a sound revenue stream for the Rose Bowl and contribute to funding improvements to the Central Arroyo, as was arranged after the concerts in 2014.

However, the severe impact of such a large event on both the surrounding neighborhoods and neighborhoods along the traffic corridors serving the Rose Bowl must be fully considered and taken into account.

Here are considerations that need to be included in the music and arts festival EIR:

- 1. Consider the cumulative impact of displacement events plus additional events** which are not big enough to be classified as displacement events. These events have serious impacts on activities in the Arroyo and on the neighborhood. The Rose Bowl website listed 25 such events for 2014.
- 2. Describe mitigations in measurable ways**, so we can see how mitigations are progressing, and prioritize areas for further improvement or punitive action. For example, use strategically placed sound meters in the neighborhoods to measure sound levels over each festival, and use traffic counts at selected intersections to get traffic counts that can be compared with estimates.
- 3. Establish a formal program to continuously monitor and minimize the impact of events** on the surrounding neighbors. This program should be rigorously pursued and fully funded.
- 4. Provide expected attendance by age group.** Different mitigations would be needed depending on the predominant age groups.
- 5. Specifically consider how to mitigate negative impact to the Brookside golf courses and Brookside Park facilities.** A three-day event would cause more damage than events that use the golf courses and park areas only for parking cars. Include penalties for failure to provide the mitigations.
- 6. How would the ban on camping be enforced?** The Final Initial Report states that "no tailgating or RV/overnight camping is proposed." (page 7)
- 7. How will people be prevented from gathering in the neighborhoods** to listen to concerts for free? People could gather like they do for 4th of July fireworks.
- 8. Specify the hours of exception from noise ordinances, maximum allowable volume, and actions to be taken if the criteria are exceeded.** Waiving the City's noise ordinances for three consecutive days and nights would result in resident hardship. As you know, acoustics in the Arroyo are very complex. Some living nearby hear very little noise, while those living much further away can be seriously impacted by the noise. This is an area where consistent measurements to validate compliance, provisions for immediate correction of non-compliance, and actively working to minimize impact on the neighborhoods are very important.

9. **Include aircraft noise, especially helicopters**, in your assessments.
10. **Include fireworks and other pyrotechnics** in your assessment of noise; they were deemed not significant for hazards.
11. **Street closure plans should be consistent and well maintained.** Streets that have traditionally been closed were not closed for some of the 2014 concerts. For example, Arbor Street residents were subjected to a steady stream of cars and buses, some traveling at high speeds, and considerable noise from boisterous concertgoers, even though the street was supposed to be closed.
12. **How would traffic management differ for this event compared with others**, for example a well-attended football game?
13. **Consider and publicize hours of traffic restrictions**, for example making Arroyo Blvd. one-way.
14. **If concert-goers can go in and out of the Arroyo during the event**, what is the impact on traffic and how would that be controlled?
15. **What special provisions will be made for weekday event traffic management?**
16. **How will alcohol consumption and its effects** on the neighborhoods be controlled?
17. **How will the ban on illegal vendors be enforced?**
18. **Please provide an unconditional guarantee that there will be no NFL games the same year as a Festival.** Statements in the Final Initial Report about the possibility of having both the festival and NFL games in the same year are unclear. On page 6, one sentence says that "the Amendment [to the Pasadena Municipal Code] would specify that the proposed Festival could not occur in the same calendar year as any National Football League (NFL) regular season game..." The next paragraph says "Additionally, subject to City Council approval, 13 additional events may be hosted by the NFL for five years from the first NFL event."
19. **Include a debriefing meeting, open to residents, after each festival.**

Thank you for the opportunity to comment on the scope of this EIR. How well we mitigate negative impacts from stadium events matter greatly to the quality of life in our neighborhoods.

Sincerely,



Geoffrey Baum  
President, West Pasadena Residents' Association

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